

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

**IN RE:
CAMP LEJEUNE WATER LITIGATION**

Case No. 7:23-CV-897

This Document Relates to:
ALL CASES

MOTION TO ESTABLISH EVIDENCE DEPOSITORY PROTOCOL

The Plaintiffs Lead Group (“PLG”) submits this request for the Court to establish a protocol for the storage of individual plaintiffs’ evidence related to Camp Lejeune Justice Act (“CLJA”) civil actions. In support of this motion, the PLG shows as follows:

1. This CLJA litigation involves events of as long as over seventy (70) years ago, and relevant evidence includes tangible items, records, and documents existing or stored in a wide array of physical and virtual media, old and new. While much information exchanged in discovery and preserved as potential evidence will be in the form of or converted to electronic format, the conversion of other documents and evidence, currently in tangible form, may be infeasible or unduly costly and time-consuming.

2. Therefore, the PLG believes that there is a need for a single depository (“Depository”), under the ongoing jurisdiction of this Court, to which the PLG and individual plaintiffs may produce such evidence for use in this CLJA litigation. Indeed, the Manual for Complex Litigation, Fourth Edition (Federal Judicial Center 2004) (“MCL”) recognizes the importance and utility of depositories in these circumstances. MCL Section 11.444

3. For these reasons, the PLG requests that the Court enter an Order governing the establishment of such a Depository. A proposed Order setting forth a protocol for such a Depository is attached hereto as **Attachment 1**.

4. The PLG is authorized to report that Defendant United States of America does not oppose the creation of such a Depository.

[Signatures follow on next page]

DATED this 17th day of April, 2024.

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CERTIFICATE OF SERVICE

I, J. Edward Bell, III, hereby certify that the foregoing document was electronically filed on the Court's CM/ECF system on this date, and that all counsel of record will be served with notice of the said filing via the CM/ECF system.

This the 17th day of April, 2024.

/s/ J. Edward Bell, III

J. Edward Bell, III